

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

ISABEL TERESA FERNANDEZ JENKINS, as	:	
Next of kin of MYKEL D. JENKINS (Deceased),	:	
	:	
Plaintiff,	:	
	:	
vs.	:	Civil Action No. 1:22-cv-69
	:	
CITY OF CHATTANOOGA, CHATTANOOGA	:	
POLICE DEPARTMENT, JOHN DOE 1, JOHN	:	
DOE 2, JOHN DOE 3, and JOHN DOE 4, in their	:	
Official capacities as agents for the Chattanooga	:	
Police Department,	:	
	:	
Defendants.	:	

JOINT MOTION FOR EXTENSION OF TIME
TO FILE EXPERT DISCLOSURES

Plaintiff and Defendants jointly move this Honorable Court for a short extension of the current discovery deadlines of fourteen (14) days for Defendants to file their Expert Witness Disclosures until July 12, 2023. The parties also jointly move this Court to grant an extension of any Expert Witness Rebuttal disclosures by Plaintiff until July 26, 2023. Defendants would show that their police procedures expert, Emanuel Kapelsohn, has requested a two-week extension to complete his expert witness report due to his current workload on other federal court litigation. The Parties are requesting a two (2) week Discovery cut-off extension for fact and discovery experts until August 10, 2023.

Respectfully submitted,

CITY OF CHATTANOOGA, TENNESSEE
OFFICE OF THE CITY ATTORNEY

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